

## **Finding of No Significant Impact Privatization of Army Lodging Program Fort Belvoir, Virginia**

Pursuant to the Council on Environmental Quality (CEQ) Regulations (Title 40 of the *Code of Federal Regulations* [CFR] Parts 1500–1508) for implementing the procedural provisions of the National Environmental Policy Act (Title 42 of the *United States Code* 4321 *et seq.*) and 32 CFR Part 651 (Environmental Analysis of Army Actions), Fort Belvoir, Virginia, conducted an environmental assessment (EA) of the potential environmental and socioeconomic effects associated with executing a lease at Fort Belvoir under the Army's Privatization of Army Lodging (PAL) program.

### **Proposed Action**

The Army proposes to transfer ownership and operation of its transient lodging facilities to a private-sector development company. Under the proposed action, the Army would direct the implementation of the Lodging Development Management Plan, lease, and supporting agreements negotiated with and approved by the Office of the Assistant Secretary of the Army for Installations, Energy, and Environment. The Army would convey specified lodging facilities and lease the underlying land to its selected development partner, Lend Lease. Lend Lease has formed a special-purpose entity, Rest Easy, LLC (Rest Easy) to execute the lease with Army as lessor and Rest Easy as lessee. Lend Lease would redevelop the lodging facilities, and InterContinental Hotels Group, its contracted hotelier, would manage the lodging operations. The Army would grant a 50-year lease of the land underlying the existing facilities and other land for constructing new lodging facilities. Rest Easy would be expected to meet Fort Belvoir's lodging requirements through operating and maintaining the existing facilities and by renovating inadequate facilities and constructing new ones.

Implementing the PAL program at Fort Belvoir would result in the conveyance of 10 of the 12 existing lodging facilities from Army inventory to Rest Easy, renovation of those facilities for either short- or long-term use, and construction of one new hotel; providing a final inventory of about 483 rooms in four facilities at the end of the initial development period. The proposed action would improve the quality of life for Soldiers, their families, and other personnel eligible to use Army transient lodging. The initial development period would occur over about 5 years beginning in 2011.

It should be noted that in the EA the proposed action contained a different mix of short- and long-term conveyances from the Army to Rest Easy. Initially the Army considered a short-term conveyance of Buildings 806 and 807 (the PCS Suites) to Rest Easy, which would have resulted in a final inventory of approximately 538 units at the end of the initial development period, increasing the on-post transient lodging by about 4 units from the existing 534 units. Since completion of the EA, however, Rest Easy has further refined the lodging development plan to work within the financial constraints of the overall PAL program. In addition to Buildings 806 and 807 now being held by Rest Easy for the duration of the 50-year lease, the new Candlewood Suites that will be constructed is only to have 123 rooms. The lease for Parcel G will be a short-term hold with the option to extend it to a long-term hold or cancel the lease at the convenience of the government. The changes in the lodging development plan are identified in Table ES-1.

Under the final development plan, implementation of the PAL action would result in 55 fewer units than initially assessed in the EA, and would not involve the demolition of Buildings 806 and 807. The lower number of units to be attained at the end of the initial development period would be expected to result in lessened long-term impacts on traffic than what was assessed in the EA. Not demolishing Buildings 806 and 807 would reduce the amount of solid waste, demolition dust, demolition noise, and aesthetic impacts that were assessed in the EA.

**Table ES-1  
Changes in the Development Plan**

Proposed Actions as Assessed in the EA					Changes in FNSI	
Acres	Building	Current units	End state	PAL action	End state	PAL action
Parcel A (Knadle Hall)						
10.5	470	219	219	Renovate and maintain in lodging portfolio	217	No change in development plan, but fewer units in the new lodging structure, rebranded as a Candlewood Suites
	NB	0	200	Preferred new build site; Staybridge Suites	123	
Parcel B (Fairfax Village)						
8	505	45	0	Renovate for STH, then demolish	0	No change in development plan
	506	29	0		0	
	507	42	42	Renovate and maintain in lodging portfolio	42	
	508	42	42		42	
	509	35	35		35	
Parcel C (PCS Suites)						
1.5	806	9	0	Renovate for STH, then demolish	9	Renovate and maintain in lodging portfolio
	807	16	0		15	
Parcel D (Historic BOQs)						
4	80	44	0	Renovate for STH, then return to Army	0	No change in development plan
	81	44	0		0	
Parcel G (Alternate New Build Site)						
15.5	NB	0	200	Alternate new build site	0	Site not to be used at this time, but will be re-evaluated in the first 5 years

Notes: BOQs=Bachelor Officer's Quarters, FNSI=Finding of No Significant Impact, NB=New Build, PCS=Permanent Change of Station, STH = short-term hold.

Overall, the changes in the development plan would result in reduced short-term impacts on noise, air emissions, and aesthetics, and reduced long-term impacts on solid waste generation, traffic, and utility usage. As such, the impacts identified in the EA are slightly greater than what would be expected actually from implementation of the PAL Program at Fort Belvoir.

Note also that the parcel designations used in the EA differ from those used in the real estate documents. The designations are compared in Table ES-2. No changes in parcel sizes or configurations have been made, nor are any new parcels introduced in the revised development plan.

### **Purpose and Need**

The purpose of the proposed action is to transfer ownership and operation of transient lodging to the private sector. The proposed action is needed to provide affordable, quality transient lodging facilities to Soldiers and their families through a combination of new facilities and improvements to existing facilities to ensure that they meet current commercial standards for mid-scale hotels.



**Table ES-2  
Parcel designation comparison**

<b>EA Parcel Designation</b>	<b>Facilities on Parcel</b>	<b>Real Estate Parcel Designation</b>
A	Knadle Hall and preferred new build site	C
B	Buildings 505–509 (Fairfax Village)	E
C	Buildings 806–807 (PCS Suites)	B
D	Buildings 80–81 (Historic BOQs)	D
G	Alternate new build site	A

### **Alternatives Considered**

The alternative to the proposed action that was considered is reliance on the off-post hotel market. In lieu of privatizing the function, the Army could exit the lodging business, resulting in patrons' reliance on off-post hotels and motels for similar services. The use of off-post lodging, however, would lengthen Soldiers' workdays because of commuting and increased transportation costs. In some instances, Soldiers would encounter shortages of lodging in adjacent communities. Terminating the Army's lodging program at Fort Belvoir would result in rendering 12 buildings idle. The combination of the buildings standing idle until alternative uses could be determined and the time needed to achieve such uses would contravene the Army's policy to manage its resources to their optimal potential. For those reasons, the off-post hotel market alternative is not feasible and is not evaluated in detail in this EA. As prescribed by the CEQ regulations, the EA also evaluates the No Action Alternative, which would consist of the Army's not implementing the PAL program at Fort Belvoir.

### **Factors Considered in Determining that No Environmental Impact Statement is Required**

The EA, which is attached hereto and incorporated by reference into this Finding of No Significant Impact (FNSI), examines the potential effects of the proposed action and the No Action Alternative on resource areas and areas of environmental and socioeconomic concern: land use, aesthetic and visual resources, air quality, noise, geology and soils, water resources, biological resources, cultural resources, socioeconomics (including environmental justice and protection of children), transportation, utilities, and hazardous and toxic materials.

Implementing the proposed action would result in a combination of short- and long-term minor adverse and long-term minor beneficial effects. Short-term minor adverse effects on aesthetics and visual resources, air quality, noise, soils, surface water and groundwater, biological resources, and transportation would be expected, primarily associated with construction and renovation activities. Long-term minor beneficial effects on surface waters and groundwater would result from increased storm water infiltration on any areas converted from an impervious to a pervious surface. Long-term minor beneficial effects on aesthetics and visual resources and on socioeconomics (quality of life) would be expected from the overall improved quality of the lodging facilities.

Mitigation actions are used to reduce, avoid, or compensate for significant adverse effects. The EA does not identify any significant adverse effects on human health or the environment; however, potential adverse effects of implementing the proposed action would be minimized by implementing certain BMPs, as listed below.



- The Army or its proponent would perform a jurisdictional determination of wetlands on Parcel A, and on any other parcel as necessary, before any ground disturbance.
- The Army or its proponent would implement and strictly adhere to applicable state and local erosion and sediment control/stormwater management laws and regulations to protect water quality in streams on and near the PAL parcels.
- The Army or its proponent would survey for the small whorled pogonia, a federally endangered plant species, on PAL Parcels A, C, and D before any ground disturbance.
- A Programmatic Agreement (PA) between Fort Belvoir and the Virginia State Historic Preservation Officer has been developed. It outlines methods by which important cultural resources will be protected during the lease period and will become part of the lease agreement with Rest Easy. Notably, Lend Lease would perform all renovation work on Buildings 80 and 81 in accordance with the restrictions and conditions of the PA. The assessment of impacts on cultural resources in the EA and this FNSI together constitute compliance with the National Historic Preservation Act in accordance with 36 CFR 800.8(c).
- In accordance with Fort Belvoir's two-to-one tree replacement policy, the Army or its proponent would replace any tree of 4 inches or more in diameter (at *breast height*) removed in the course of implementing the PAL program with two native trees to provide habitat value for wildlife on Fort Belvoir property.
- The Army or its proponent would perform a breeding bird survey on PAL Parcel A to determine usage before any clearing would be performed. Construction would be timed to avoid impacts on breeding birds.

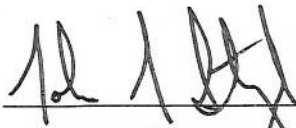
## Public Review

The EA and draft FNSI were available for review and comment for 30 calendar days (February 24 through March 26, 2011) from the publication of a Notice of Availability (NOA) in the *Washington Post* and *Springfield Connection*. During the review and comment period, information concerning the EA was available by contacting Mr. Patrick McLaughlin, Chief of Environmental and Natural Resources Division, Directorate of Public Work, 9430 Jackson Loop Suite 200, Fort Belvoir, Virginia 22060-5116; (703) 806-4007. Copies of the EA and draft FNSI were provided to the libraries listed in Section 7 of the EA and were posted on the Fort Belvoir website: <http://www.belvoir.army.mil>. Written comments on the EA and draft FNSI were received from the Northern Virginia Regional Commission; the U.S. Environmental Protection Agency, Region 3; the National Capital Planning Commission; and the Virginia Department of Environmental Quality (VDEQ). Commentors noted permitting and regulatory requirements that the Army would have to meet before and during PAL development, which the Army and Rest Easy will comply with as a matter of complying with state and federal regulatory requirements, and by implementing the BMPs mentioned above. Only VDEQ noted a potential issue: an inconsistency with the Virginia Coastal Zone Management Program (VCP) with development plan for Parcel A (Knadle Hall and new hotel construction) as presented in the EA. The VDEQ, Department of Conservation and Recreation, Division of Chesapeake Bay Local Assistance found that based on the information provided in the EA, the proposed action would be inconsistent with the coastal lands management enforceable policy as administered through the *Chesapeake Bay Preservation Area Designation and Management Regulations*. This inconsistency would have been due to disturbance within a resource protection area (RPA). The EA provided only an outline of the Parcel A boundaries, but did not provide a building footprint that would indicate precisely where construction and ground disturbance would occur. In response to the comment, the Army provided VDEQ with a more detailed plan for Parcel A that showed where structures would be located and that no construction would occur within the RPA (see attachment). Upon reviewing the new information, VDEQ responded on April 28 that the proposed action would be fully consistent with the VCP, based on the Army's compliance with all necessary Virginia regulations

and required permits. Additionally, the Army committed to perform an on-site delineation of the RPA before any ground disturbance would occur on Parcel A and would ensure that no land disturbance or development would occur within an RPA unless specifically permitted by VCP regulations and local ordinances.

### Conclusions

On the basis of the EA, the comments received on it, and this FNSI, it has been determined that implementing the proposed action would have no significant effects on the quality of human life or the natural environment. Preparation of an environmental impact statement is not required before implementing the proposed action.



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13 Jul 2011

Date